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VIA ELECTRONIC FILING

Hon. Andrew T. Baxter
U.S. Magistrate Judge
U.S. District Court, Northern District of New York
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *Puleo v. Masonic Medical Research Institute, et al.*
Civil Action No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

The purpose of this letter is to request a sixty-day extension of the deadlines set forth in the current scheduling order. The parties have been diligently working through, but have not yet completed discovery. Written discovery has been exchanged and we are now in the process of scheduling depositions. The deadline for the close of discovery is currently March 1, 2022, with dispositive motions to be filed by May 2, 2022. With several schedules to accommodate, we are experiencing challenges in finding available dates prior to the March 1 deadline.

For this reason, we are requesting an extension of the current deadlines as follows:

- Close of Discovery on April 30, 2022
- Dispositive Motions on or before July 1, 2022

We have conferred with, and obtained the consent of, Plaintiff's counsel regarding the proposed extension.

We thank the Court for its consideration in this matter.

Very truly yours,

BOND, SCHOENECK & KING, PLLC

/s/ Hannah K. Redmond

Hannah K. Redmond

cc: Zachary C. Oren, Esq. (*via CM/ECF*)
William M. Borrill, Esq. (*via CM/ECF*)